

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

MODIFICATIONS TO MARKET
DOMINANT SERVICE
PERFORMANCE MEASUREMENT
PLAN

No. PI2022-3

**COMMENTS OF
NATIONAL NEWSPAPER ASSOCIATION, INC.**

(May 19, 2022)

Pursuant to Order No. 6159, National Newspaper Association (NNA) hereby submits comments on the Postal Service's Proposed Service Measurement Plan filed April 22, 2022.

NNA represents community newspapers across the country that rely upon Periodicals mail for their primary distribution to subscribers. As businesses, these newspaper companies also are heavy users of First-Class mail. The newspapers tend to be small and often rural in circulations, local in focus and owned by private individuals or companies. Declines in mail service hurt them as well as their communities.

In recent years, changes in USPS's service performance have caused most NNA members to lose subscribers who are disappointed in slow service and aggregation of several weekly issues in mail processing so that multiple pieces are delayed and presented in one mailbox arrival. NNA is currently engaged in a complex and extended conversation with the Postal Service to identify ways to remedy these problems, many of which are not visible in the service performance reports. The issues behind this lack of visibility are outside the scope of this docket, but NNA takes this opportunity to remind the Commission that for newspaper subscribers, the SMP provides little clarity.

The Postal Service proposes three major changes in its reporting of service performance. NNA addresses each in turn.

1. The Postal Service proposes to add Business Reply Mail to the SMP. This proposal is unquestionably a positive addition to the visibility of First-Class Mail. NNA members are users of this product for subscription payments, usually local in both origin and destination. To the extent that the addition of these data focuses attention on the need for prompt delivery, improvements in reply mail will help small newspaper companies with their cash flows.
2. The Postal Service proposes to eliminate the long-haul exclusion that keeps some mail out of the measurement system. NNA has no expertise in this type of mail, but generally supports all actions by USPS to improve visibility.
3. The Postal Service also proposes to change Critical Entry Times for Periodicals from 11 a.m. to 8 a.m. as a consistent CET for Periodicals in all facilities. NNA joins several other commenters in this docket in noting that this change is not a reporting technicality, but actually a change in service performance.

Most community newspaper mail is entered at Delivery Units, often in an overnight drop for next-day or even same-day service. But in urban areas, entry of newspapers more often occurs at Processing and Distribution Centers, which will adopt the new 8 a.m. CET. These plants often serve both as an entry post office for a 5-digit area and as a first-sort operation for zip codes in a metro service area. For urban newspapers, an 8 a.m. CET will cause service delays. Because of supply chain shortages of paper, a shrinkage of printing capacity and personnel shortages in newspaper printing plants, simply adjusting printing schedules by three hours will not be possible for many publishers. Moreover, an 11 a.m. CET offers printers and publishers an opportunity to navigate urban traffic after rush hour, while an 8 a.m. cut-off puts the delivery trucks in the middle of the worst urban traffic. NNA anticipates that many printers and publishers will be unable to adjust and will sacrifice a delivery day for a product whose time sensitivity is already a problem. So while the Postal Service's goals to improve visibility are admirable, mailers hurt by slower service will hardly appreciate the progress.

The change in CETs may have merit in consistency or other important values. But it is not a measurement or reporting change, as are the other proposals in this docket. The Commission should seek additional information on service impacts before proceeding.

Respectfully submitted,

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